

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION**

GEORGIA POWER COMPANY,
OGLETHORPE POWER CORPORATION,
MUNICIPAL ELECTRIC AUTHORITY OF
GEORGIA, and the CITY OF DALTON,
GEORGIA,

Plaintiffs/Counterclaim Defendants,

v.

STONE & WEBSTER, INC. and
WESTINGHOUSE ELECTRIC COMPANY
LLC,

Defendants/Counterclaim Plaintiffs.

Case No. 1:12-cv-167-JRH-JEG

**CONSENT MOTION FOR EXTENSION OF TIME FOR OWNERS TO REPLY TO
WESTINGHOUSE ELECTRIC COMPANY'S RESPONSE TO
OWNERS' MOTION TO COMPEL DISCLOSURE OF DOCUMENTS**

The Owners request that this Court grant this Consent Motion for Extension of Time to Reply to Westinghouse Electric Company's Response (ECF No. 286) to Owners' Motion to Compel Disclosure of Documents (ECF No. 270). Under the Federal and Local Rules, the Owners' Reply is currently due on October 23, 2015.

The Owners requested a 7-day extension to file their Reply from Westinghouse on October 19, 2015. Counsel for Westinghouse consented to the extension after conferring with counsel for the Owners. Accordingly, the Owners ask the Court to grant this Consent Motion and extend the deadline for the Owners to file their Reply from October 23, 2015, to October 30, 2015. A proposed order granting the motion is attached.

Respectfully submitted this the 21st day of October, 2015.

/s Allen M. Estes

Allen M. Estes

Admitted Pro Hac Vice

Alabama Bar No. ASB-5866-A27E

Counsel for Plaintiffs Georgia Power Company;
Oglethorpe Power Corporation; Municipal Electric
Authority of Georgia; and the City of Dalton,
Georgia

1901 Sixth Avenue North

Suite 1500

Birmingham, Alabama 35203

Telephone: (205) 226-8717

E-mail: aestes@balch.com

TUCKER LONG

Benjamin Brewton

Georgia Bar No. 002530

Lead Counsel for Plaintiffs Georgia Power
Company; Oglethorpe Power Corporation;
Municipal Electric Authority of Georgia; and the
City of Dalton, Georgia

Post Office Box 2426

August, Georgia 30903-2426

Telephone: (706) 722-0771

E-mail: bbrewton@tuckerlong.com

BALCH & BINGHAM LLP

T. Joshua Archer

Georgia Bar No. 021208

Counsel for Plaintiffs Georgia Power Company;
Oglethorpe Power Corporation; Municipal Electric
Authority of Georgia; and the City of Dalton,
Georgia

30 Ivan Allen, Jr. Boulevard, N.W.

Suite 700

Atlanta, Georgia 30308

Telephone: (404) 261-6020
Facsimile: (404) 261-3656
E-mail: jarcher@balch.com

M. Stanford Blanton
Alabama Bar No. 4913-75M
(Admitted pro hac vice)
Counsel for Plaintiffs Georgia Power Company;
Oglethorpe Power Corporation; Municipal Electric
Authority of Georgia; and the City of Dalton,
Georgia
1901 Sixth Avenue North
Suite 1500
Birmingham, Alabama 35203
Telephone: (205) 251-8100
Facsimile: (205) 226-8799
E-mail: sblanton@balch.com

JONES DAY

G. Lee Garrett, Jr.
Georgia Bar No. 286519
Counsel for Plaintiffs Georgia Power Company;
Oglethorpe Power Corporation; Municipal Electric
Authority of Georgia; and the City of Dalton,
Georgia
1420 Peachtree Street, N.E.
Suite 800
Atlanta, Georgia 30309-3053
Telephone: (404) 581-8013
Email: ggarrett@jonesday.com

TROUTMAN SANDERS

Frank E. Riggs
Counsel for Plaintiffs Georgia Power Company;
Oglethorpe Power Corporation; Municipal Electric
Authority of Georgia; and the City of Dalton,
Georgia
600 Peachtree Street, N.E.

Suite 5200
Atlanta, Georgia
Telephone: (404) 885-3000
E-mail: frank.riggs@troutmansanders.com

ARNALL GOLDEN GREGORY LLP

Jeffrey Y. Lewis
Georgia Bar No. 450713
Scott A. Wandstrat
Georgia Bar No. 736514
C. Knox Withers
Georgia Bar No. 142842
Counsel for Plaintiff Oglethorpe Power Corporation
171 17th St., N.W.
Suite 2100
Atlanta, GA 30363-1031
Telephone: (404) 873-8500
E-mail: Jeffrey.lewis@agg.com
E-mail: scott.wandstrat@agg.com
E-mail: knox.withers@agg.com
Charles W. Whitney
Georgia Bar No. 756650
Counsel for Oglethorpe Power Corporation
2100 East Exchange Place
Tucker, GA 30084
Telephone: (770) 270-7600
E-mail: chuck.whitney@opc.com

ALSTON & BIRD

William H. Hughes, Jr.
Georgia Bar No. 376450
Michael H. Shanlever
Georgia Bar No. 141292
Counsel for Municipal Electric Authority of
Georgia
One Atlantic Center
1201 West Peachtree Street
Suite 4200

Atlanta, GA 30309-3424
Telephone: (404) 881-7000
E-mail: bill.hughes@alston.com
E-mail: mike.shanlever@alston.com

MINOR BELL NEAL

William F. Jourdain
Georgia Bar No. 405465
Counsel for the City of Dalton, Georgia
745 College Drive
Suite B
Telephone: 706-712-5719
Facsimile: 706-278-3569
E-mail: wjourdain@mbnlaw.com

CERTIFICATE OF SERVICE

In accordance with Fed. R. Civ. P. 5 and S.D. Ga. LR 5.1, I hereby certify that I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notifications of the filing to all attorneys of record.

Submitted this the 21st day of October, 2015.

s/Allen M. Estes

Allen M. Estes